



Robert P. Feinland
Counsel
Direct (212) 655-3575
rf@msf-law.com

MEMO ENDORSED

at page 2

June 11, 2025

VIA ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Teradek LLC v. Shenzhen Hollyland Tech Co., Ltd et al. - No. 1:20-CV-09170*
Motion for 90-Day Stay of Case Deadlines and Non-Binding Mediation

Dear Judge Ramos:

We were recently retained to represent Defendants Shenzhen Hollyland Tech Co., Ltd and EC Pro Video Systems Inc. (collectively the “Defendants”) in the above-referenced matter.¹ We write to respectfully request a 90-day stay of all case deadlines. As Your Honor can appreciate, this case has been ongoing for over 4.5 years and Defendants seek this 90-day stay to allow their newly retained counsel to review the case, familiarize ourselves with the facts, procedural history, and review the documents exchanged during discovery as well as the deposition transcripts in order to properly litigate the case on Defendants’ behalf.

In addition, Defendants respectfully propose that the Court directs the parties to engage in non-binding mediation to allow for meaningful settlement discussions either during the requested stay or shortly thereafter. This should facilitate meaningful settlement discussions.

The undersigned spoke to plaintiff Teradek, LLC (“Plaintiff”)’s counsel, Karl Fisher, on Thursday, June 5, 2025 about a proposed 90-day stay as well as participating in non-binding mediation. Mr. Fisher informed the undersigned that he needs to speak with his client and will get back to us. The undersigned followed up by e-mail on June 10, 2025 and June 11, 2025 as well as left a voicemail for Mr. Fisher on June 11, 2025 in which the undersigned sought Plaintiff’s position on the proposed stay and non-binding mediation. As of the filing of this letter, the undersigned has not heard back from Mr. Fisher on Plaintiff’s position regarding a stay and proposal to proceed with mediation.

¹ The undersigned and Gaddi Goren filed Notices of Appearances on June 11, 2025. (D.I. 394 and 395).

Hon. Edgardo Ramos

June 11, 2025

Page 2

We also note that while the undersigned will be lead counsel on this case, Allan Chan will remain on the case as co-counsel. Thus, Mr. Chan will not be filing a notice of withdrawal of his representation of Defendants in this case.

We appreciate your time and attention to this matter, and are available to participate in a conference at the Court's convenience

Respectfully submitted,

/s/ Robert P. Feinland

Robert P. Feinland

cc: Counsel of Record – by CM/ECF

Defendants' requests for a 90-day stay and for the Court to direct the parties to engage in mediation are denied. The parties are directed to meet and confer on reasonable expert discovery deadline extensions, and on potential resolution. Defendants are directed to make payment, directed by the Court's May 22, 2025 order, or to otherwise show cause for non-payment and non-compliance with the Court's May 22 order, by June 18, 2025.

SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: June 13, 2025

New York, New York